HUSBAND AND WIFE—ALIENATION OF AFFECTIONS.—In an action brought by a wife against the mother and step-father of her husband for alienating his affections, relief was denied and it was *held* that though the result of the parents' action was the alienation of the husband's affections, yet no recovery could be had if the parents acted in good faith. *Brison* v. *McKellop,* (Okla. 1914) 138 Pac. 154.

"In every suit of this character the prime inquiry is: From what motive did the father act? Was it malicious or was it inspired by a proper parental regard for the welfare and happiness of the child?" *Tucker* v. *Tucker,* 74 Miss. 93, 32 L. R. A. 623. The substance of the foregoing statement is universally recognized as giving the governing principle. *Multer* v. *Knibbs,* 193 Mass. 556, 9 L. R. A. N. S. 322. A parent may not interfere simply because he is displeased with the marriage, or because it was against his will, or because he wishes the marriage relation to cease. But if he acts in good faith and upon reasonable grounds, although his advice turns out to be unfortunate, yet the parent is not liable. *Oakman* v. *Belden,* 94 Me. 280, 80 Am. St. Rep. 396. If the intermeddler is a stranger a more stringent rule is applied. *Barton* v. *Barton,* 119 Mo. App. 507. But at least one court has held that advice honestly given will bar a right to recover damages even from a stranger. *Tasker* v. *Stanley,* 153 Mass. 148, 26 N. E. 417.

MASTER AND SERVANT—FELLOW-SERVANTS AS "APPLIANCES."—In a personal injury suit against the defendant company the question arose as to whether the proximate cause of the injury was the negligence of a fellow-servant, or the negligence of the defendant in failing to supply a sufficient number of workmen to insure the safety of the plaintiff, or the negligence of the defendant in employing and retaining in its service, as a fellow-servant with the plaintiff, one whose character and habits so far unsuited him for employment in the work on which the defendant's servants were engaged as to jeopardize the plaintiff's safety. The laws of South Carolina were pleaded as the basis of the action, the cause having arisen in that state. *Held,* that the laws of that state would govern, and under the rulings of its Supreme Court the term "appliances" includes human agencies, by virtue of which holding, the jury were to determine whether the defendant was liable for the acts of the agent on the ground that unsafe appliances had been furnished, thereby negativing the "fellow-servant" defence. *White* v. *Seabord Air Line Railway,* (Ga. App. 1914) 80 S. E. 667.

An appliance has been defined as anything brought into use as a means to effect some end. *Honaker* v. *Board of Education,* 42 W. Va. 170. Under such a comprehensive meaning, the South Carolina courts are perfectly justified in holding that the term "appliance," as used in the Constitution, Art. 9; Sect. 15, "includes not only inanimate machinery and tools and apparatus, but also the living men or persons needed to operate the machinery." *Bodie* v. *Charleston & W. C. Ry. Co.,* 61 S. C. 468. The same rule has also been pronounced in Wisconsin in *Johnson* v. *Ashland Water Co.,* 71 Wis. 553. In most of the cases in which this point has been considered the question was whether the master is liable for injury to a servant where the number